

## United States Senate

COMMITTEE ON FINANCE  
WASHINGTON, DC 20540-6200

April 21, 2010

### Via Electronic Transmission

Lynn V. Mitchell  
Medicaid Director  
Oklahoma Health Care Authority  
State of Oklahoma  
4545 North Lincoln Boulevard  
Oklahoma City, OK 73105

Dear Medicaid Director Mitchell:

In the United States, the federal and state governments spend roughly \$317 billion every year on the Medicaid program. As Ranking Member of the Senate Committee on Finance, I have an obligation to ensure that taxpayer dollars are appropriately spent on federal health care programs. Like the Medicare program, Medicaid suffers from systemic weaknesses that lead to fraud, waste, and abuse across the program, resulting in higher costs and less health care to those who are in need. The overutilization of prescription drugs, whether through drug abuse or outright fraud, plays a significant role in the rising cost of our healthcare system. The purpose of this letter is to request information regarding certain outliers in Oklahoma's Medicaid program and what steps Oklahoma takes to monitor rates of utilization.

In recent inquiries, I have asked the U.S. Department of Health and Human Services about physicians prescribing mental health drugs at astonishingly high rates. In addition to these concerns, a recent CNN report detailed the increasing abuse of OxyContin, Roxicodone, and Xanax. Specifically, the report described the role some pain management clinics and physicians play in the black market for these drugs. I write today to better ascertain how high rates of both mental health and pain medication utilization are affecting the Medicaid program, as well as how Oklahoma's rates compare to the national rates.

To that end, please provide charts that list of the top ten Medicaid prescribers of the following drugs for the years 2008 and 2009. For each prescriber, please provide his/her prescriber identifier, and the number of prescriptions written per drug per year, and the total amount billed to Medicaid per drug, separated for each year.

- Abilify;
- Geodon;
- Seroquel;
- Zyprexa;

- Risperdal;
- OxyContin;
- Roxicodone; and
- Xanax.

I thank you in advance for your cooperation and request that you provide the requested documents and written responses by no later than May 5, 2010. In your reply, please format information into a chart like the examples provided below. All formal correspondence should be sent electronically in PDF format to [Brian\\_Downey@finance-rep.senate.gov](mailto:Brian_Downey@finance-rep.senate.gov) or via facsimile to (202) 228-2131. Of course should you wish to discuss this matter further, please do not hesitate to contact Christopher Armstrong of my Committee staff at (202) 224-4515.

Sincerely,



Charles E. Grassley  
Ranking Member

Attachment

**Drug X, 2008**

Prescriber Identifier	Total prescriptions	Total billed to Medicaid
123456789	25,000	250,000
234567891	24,000	240,000
345678912	23,000	230,000
456789123	22,000	220,000
567891234	21,000	210,000
678912345	20,000	200,000
789123456	19,000	190,000
891234567	18,000	180,000
912345678	17,000	170,000
012345678	16,000	160,000

**Drug X, 2009**

Prescriber Identifier	Total prescriptions	Total billed to Medicaid
123456789	25,000	250,000
234567891	24,000	240,000
345678912	23,000	230,000
456789123	22,000	220,000
567891234	21,000	210,000
678912345	20,000	200,000
789123456	19,000	190,000
891234567	18,000	180,000
912345678	17,000	170,000
012345678	16,000	160,000

MIKE FOGARTY  
CHIEF EXECUTIVE OFFICER



BRAD HENRY  
GOVERNOR

STATE OF OKLAHOMA  
OKLAHOMA HEALTH CARE AUTHORITY

May 5, 2010

Via Electronic Transmission  
Brian\_Downey@finance-rep.senate.gov

The Honorable Charles E. Grassley  
United States Senate  
Committee on Finance

Re: Oklahoma - Top Ten Medicaid Prescribers for identified prescription products

Dear Senator Grassley,

Attached is the response to your April 21, 2010 request for the top ten prescribers for selected drugs in the Oklahoma Medicaid program.

If you have additional questions, please do not hesitate to contact our office at 405-522-7417.

Sincerely,

Lynn V. Mitchell, M.D., MPH  
State Medicaid Director

Abilify, 2008		
Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1225065006	1,606	\$728,609.93
1316994551	1,062	\$436,229.22
1497815187	932	\$380,081.15
1851357974	911	\$435,550.91
1558318030	789	\$345,157.23
1336222504	713	\$338,761.77
1124112685	658	\$285,631.18
1508934126	633	\$271,483.53
1992770853	624	\$296,174.45
1356432637	569	\$265,146.96

Abilify, 2009		
Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1225065006	2,093	\$974,747.86
1851357974	994	\$489,911.09
1316994551	973	\$433,760.08
1811985062	950	\$463,600.15
1700950268	794	\$369,914.26
1497815187	712	\$302,010.32
1558318030	684	\$316,578.73
1356432637	678	\$341,353.34
1508934126	652	\$292,498.90
1982677654	570	\$235,659.96

Geodon, 2008		
Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1700950268	425	\$114,242.11
1578599916	348	\$119,176.93
1316994551	343	\$111,923.88
1063453223	329	\$110,376.48
1851357974	297	\$108,505.97
1699844043	292	\$123,174.65
1225065006	256	\$92,744.13
1558318030	226	\$81,334.44
1497815187	212	\$75,325.32
1508934126	187	\$47,545.64

Geodon, 2009		
Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1700950268	547	\$157,195.06
1699844043	371	\$155,344.85
1316994551	355	\$139,158.25
1225065006	293	\$126,178.33
1063453223	292	\$111,165.30
1851357974	291	\$116,835.07
1922050335	213	\$101,709.64
1558318030	195	\$75,314.81
1922049386	172	\$65,995.79
1659390284	164	\$52,806.91

Seroquel, 2008		
Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1558318030	1,069	\$460,758.49
1225065006	924	\$267,452.02
1316994551	875	\$345,551.85
1578599916	803	\$321,945.48
1336222504	768	\$360,932.35
1851357974	637	\$222,538.67
1700950268	629	\$206,858.98
1023054434	605	\$204,952.35
1922050335	593	\$149,078.14
1699844043	525	\$279,998.25

Seroquel, 2009		
Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1558318030	1,226	\$522,603.34
1225065006	802	\$294,001.10
1316994551	797	\$338,203.82
1700950268	779	\$291,175.21
1336222504	737	\$371,763.93
1851357974	678	\$267,036.92
1922050335	618	\$151,214.93
1396965091	568	\$176,240.07
1497815187	520	\$135,282.32
1245326925	515	\$214,055.83

Zyprexa, 2008		
Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1336222504	383	\$268,432.22
1851357974	243	\$189,031.97
1851307607	233	\$82,907.46
1558318030	223	\$136,561.12
1578599916	220	\$130,236.53
1699844043	219	\$154,926.79
1881682888	192	\$85,741.87
1316994551	175	\$96,963.93
1265525042	174	\$73,165.96
1700950268	168	\$89,489.91

Zyprexa, 2009		
Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1336222504	748	\$496,273.74
1558318030	278	\$192,221.11
1699844043	221	\$176,868.51
1316994551	221	\$137,125.28
1225064041	219	\$96,064.95
1851307607	218	\$87,327.64
1851357974	211	\$175,414.40
1700950268	204	\$104,313.04
1659390284	187	\$106,782.06
1356432637	185	\$130,729.18



**Risperdal, 2008 - Generics**

Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1225065006	601	\$102,502.17
1316994551	484	\$101,183.12
1396965091	442	\$61,736.33
1023054434	413	\$69,245.15
1932293974	355	\$111,264.60
1881692291	317	\$45,040.87
1053401604	259	\$45,352.82
1033103304	251	\$40,761.55
1811985062	243	\$37,436.80
1558318030	230	\$49,077.77

**Risperdal, 2008 - Brand**

Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1225065006	1,021	\$219,812.74
1316994551	757	\$208,675.93
1023054434	551	\$122,905.01
1790765733	428	\$94,921.96
1083787709	394	\$102,733.82
1235166364	367	\$68,081.03
1053401604	343	\$79,613.64
1396965091	340	\$58,471.95
1700950268	331	\$71,831.85
1558318030	329	\$87,606.31

**Risperdal, 2009 - Generics**

Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1396965091	1,234	\$49,958.78
1225065006	1,100	\$57,331.17
1316994551	1,026	\$61,512.90
1811985062	686	\$35,883.02
1356423784	648	\$31,465.19
1023054434	594	\$30,099.79
1053401604	584	\$28,351.04
1881692291	553	\$28,011.66
1225064041	552	\$31,748.48
1841384021	488	\$39,762.88

**Risperdal, 2009 - Brand**

Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1225064041	75	\$11,821.63
1265525042	47	\$14,789.88
1083787709	38	\$9,349.77
1851357974	32	\$13,568.65
1558318030	30	\$6,615.25
1619966827	29	\$6,320.98
1619074739	26	\$4,942.58
1023015583	24	\$7,584.86
1619961885	21	\$6,628.91
1922150531	20	\$13,529.89

Oxycontin, 2008 - Generics		
Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1124060199	879	\$170,961.54
1912081159	239	\$75,924.66
1255431409	219	\$100,478.31
1174504245	202	\$57,076.58
1487751004	124	\$19,425.79
1003981135	117	\$27,806.78
1346336856	94	\$25,564.23
1902901531	83	\$33,176.76
1700847118	79	\$17,941.36
1699823435	77	\$24,752.72

Oxycontin, 2008 - Brand		
Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1124060199	804	\$228,316.46
1255431409	486	\$361,421.92
1912081159	443	\$202,119.65
1174504245	417	\$177,690.33
1003981135	218	\$58,051.05
1427059963	208	\$70,565.90
1902901531	170	\$85,119.18
1700863586	151	\$69,212.76
1700847118	147	\$60,551.48
1699823435	128	\$43,657.53

Oxycontin, 2009 - Generics		
Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1124060199	110	\$27,980.92
1346336856	41	\$13,965.60
1649344839	40	\$8,319.42
1255431409	35	\$22,760.89
1003981135	34	\$10,070.46
1174504245	34	\$13,939.63
1922011311	33	\$14,977.78
1851307607	32	\$13,339.91
1710979315	31	\$7,579.06
1417922709	30	\$40,274.18

Oxycontin, 2009 - Brand		
Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1124060199	629	\$226,235.70
1174504245	506	\$234,600.27
1255431409	367	\$249,314.63
1912081159	282	\$146,315.61
1700847118	195	\$84,507.19
1699823435	158	\$67,199.67
1003981135	152	\$48,600.81
1649201807	141	\$81,555.26
1902901531	135	\$87,291.74
1346336856	131	\$63,436.88

Roxicodone, 2008 - Generics		
Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1255431409	817	\$60,613.45
1174504245	311	\$4,869.32
1124060199	276	\$7,073.03
1184688509	259	\$13,014.38
1003981135	219	\$7,511.08
1346336856	139	\$4,674.80
1427059963	121	\$5,230.44
1770581845	107	\$6,165.57
1487751004	104	\$2,862.70
1063487361	103	\$6,828.28

Roxicodone, 2008 - Brand		
Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1174504245	25	\$1,081.32
1700863586	17	\$777.23
1700842440	9	\$2,904.59
1003987611	9	\$341.04
1124054986	8	\$749.65
1023057668	7	\$203.85
1013129329	6	\$232.65
1477694867	6	\$197.56
1114997582	6	\$170.57
1699823435	5	\$438.09

Roxicodone, 2009 - Generics		
Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1255431409	765	\$147,226.91
1700847118	455	\$41,885.11
1174504245	335	\$9,078.24
1124060199	292	\$13,111.69
1003981135	214	\$10,114.17
1184688509	184	\$16,743.54
1346336856	180	\$14,244.98
1487751004	177	\$7,240.70
1366620833	139	\$14,288.63
1003987611	110	\$4,124.61

Roxicodone, 2009 - Brand		
Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1700842440	10	\$3,646.15
1174504245	10	\$222.09
1003987611	5	\$129.86
1023057668	4	\$64.68
1003981135	3	\$325.14
1548217813	3	\$138.21
1669446225	3	\$84.83
1083665665	3	\$66.02
1255431409	2	\$877.72
1588633119	2	\$103.64

Xanax, 2008 - Generics		
Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1922050335	2,505	\$26,962.41
1265525042	1,143	\$15,835.04
1154322329	893	\$10,168.89
1598774242	880	\$5,272.30
1154309086	837	\$9,399.02
1720048010	819	\$9,182.67
1174504245	788	\$8,953.18
1851357974	748	\$11,767.75
1558318030	684	\$6,614.46
1699823435	676	\$8,052.80

Xanax, 2008 - Brand		
Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1891861449	13	\$1,572.25
1538111976	8	\$1,466.00
1609933100	4	\$270.42
1033204151	3	\$278.10
1013077130	2	\$245.96
1710909593	1	\$183.25
1033155197	1	\$174.76
1386787547	1	\$142.51
1578556171	1	\$62.56
1558332676	1	\$61.42
1326059734	1	\$61.42
1922091511	1	\$61.42

Xanax, 2009 - Generics		
Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1922050335	2,271	\$24,344.12
1265525042	1,095	\$16,253.39
1598774242	1,094	\$6,908.09
1851357974	886	\$14,744.42
1174504245	816	\$9,664.20
1558318030	814	\$8,168.13
1154322329	786	\$9,519.34
1154309086	784	\$8,816.73
1720048010	729	\$8,335.27
1699823435	718	\$8,835.74

Xanax, 2009 - Brand		
Prescriber Identifier	Total Prescriptions	Total paid by Medicaid
1538111976	9	\$1,706.51
1891861449	9	\$1,139.90
1215906227	4	\$468.78
1629002761	2	\$308.77
1609933100	2	\$170.78
1366503930	2	\$118.84
1326030131	1	\$36.45
1386807618	1	\$61.42
1316914120	1	\$212.11

PATRICK J. LEAHY, VERMONT, CHAIRMAN

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**United States Senate**

COMMITTEE ON THE JUDICIARY

WASHINGTON, DC 20510-6276

BRUCE A. COHEN, *Chief Counsel and Staff Director*  
KOLAN L. DAVIS, *Republican Chief Counsel and Staff Director*

January 23, 2012

**VIA ELECTRONIC TRANSMISSION**

Lynn V. Mitchell  
State Medicaid Director  
Oklahoma Health Care Authority  
4545 N. Lincoln Blvd, Suite 124  
Oklahoma City, OK 73105

Dear Dr. Mitchell:

On May 5, 2010, your state provided my office with data regarding the top ten prescribers of several pain management and mental health drugs in your state. These types of drugs have addictive properties, and the potential for fraud and abuse by prescribers and patients is extremely high. Mental health drugs continue to be prescribed at astounding rates and pain management clinics are turning into a hotbed for black market painkillers. When these drugs are prescribed to Medicaid patients, it is the American people who pay the price for over-prescription, abuse, and fraud.

After an extensive review of prescribing habits of the serial prescribers of pain and mental health drugs in Oklahoma, I have concerns about the oversight and enforcement of Medicaid abuse in your state. While I am sensitive to the concerns of misinterpretation of the data you provided, the numbers themselves are quite shocking.

For example in 2009, prescriber 1225065006 wrote 2,093 scripts for Abilify—which is more than double the amount that the second highest prescriber wrote. Likewise, prescriber 1336222504 wrote 748 scripts for Zyprexa—a 470 script increase over the number two prescriber.

It is my intention to ensure that each of the states is adequately monitoring, investigating, and stopping fraud and over-prescription of these types of drugs. Therefore, please provide answers to the following questions:

1. What action, if any, has your agency taken with respect to the prescribers identified to the Committee?
2. If there has been no action taken with respect to these prescribers, please explain why not.
3. Please identify which of the providers identified to the Committee remain eligible to bill the Medicaid Program.
4. Please provide the 2010 and 2011 numbers for the top prescribers of these same drugs.
5. Has each of these prescribers been cross-checked for complaints or misconduct with the state medical board or the National Practitioner Data Bank? If not, do you plan to do so?
6. Have any of the prescribers identified to this Committee been referred to your state medical board?
7. Is there any system set up in your state to identify and monitor excessive prescription writing? If not, why not?
8. Have you received any training or guidance from the Centers for Medicare and Medicaid Studies to help identify potential issues with prescription drugs?
9. Does your state maintain a database of all prescribed controlled-substances? If so, what entities have access to it?
10. Does your state have any point-of-sale restrictions related to maximum units, prior authorization, therapeutic duplication, or early refill? If not, why not?
11. Were any of these top ten prescribers identified in the federal-mandated Drug Utilization Review or CMS-base retrospective reviews?
12. Does your state have any programs in place to educate providers about the prescription of antipsychotics to children and adolescents?

Thank you in advance for your cooperation and attention in this matter. When responding to this letter, please number your answers in accordance with my questions. I would appreciate a response by February 13, 2012. If you have any questions, please do not hesitate to contact Erika Smith of my staff at (202) 224-5225.

Sincerely,

A handwritten signature in blue ink that reads "Chuck Grassley". The signature is written in a cursive, flowing style.

Charles E. Grassley  
Ranking Member  
Committee on the Judiciary



STATE OF OKLAHOMA  
OKLAHOMA HEALTH CARE AUTHORITY

March 21, 2012

Senator Charles Grassley  
United States Senate  
Committee on the Judiciary  
327 Hart Senate Office Building  
Washington, DC 20510-6275

Dear Senator Grassley:

We share your concern about inappropriate prescribing patterns among a small number of health care providers. We offer the following information in response to your letter of January 23, 2012.

Even before your first inquiry in 2010, the Oklahoma Health Care Authority (OHCA) had been working to detect and correct inappropriate prescribing and continues to improve upon that system. Our work has not been limited to the drugs specified in your requests, but has included all narcotic pain relievers, stimulants used for ADHD, anti-anxiety medications, antidepressants, and the atypical antipsychotic medications.

As you state in your most recent letter, raw data can be subject to serious misinterpretation. For example, your letter specifically mentions two prescribers, one who is associated with the highest number of claims for Abilify and one who is associated with the highest number of claims for Zyprexa. Both of these physicians are practicing in a psychiatric facility in a rural area. We will continue to review their prescribing patterns, but at this time, the claims seem to be within appropriate limits for their practice setting.

In order to promote evidence-based prescribing and adherence to best practices in prescribing atypical antipsychotic medications, OHCA implemented a prior authorization program for those drugs in April 2010. You will find the criteria for this program attached as Appendix A. Additional resources for this program are available at this link: <http://okhca.org/providers.aspx?id=12090#Atypical>

Before the Patient Protection and Affordable Care Act (ACA) was passed, OHCA was actively monitoring prescribing practices of health care providers who were not contracted to perform services for our members. However, with the passage of this law, OHCA has been able to significantly reduce the number of non-contracted providers who were prescribing medications to SoonerCare (Oklahoma Medicaid) members. Section 6401(b)(1) of the ACA instructs states to require ordering and referring physicians to be enrolled as providers in the Medicaid program.



OHCA began to terminate coverage of prescriptions written by non-contracted prescribers in July 2011. In the past year, coverage for over 3,700 prescribers has been terminated. This action should significantly decrease the number of inappropriate narcotic prescriptions funded by state and federal taxpayer dollars through the SoonerCare program.

Your specific questions are addressed below. We appreciate the opportunity to respond to your concerns.

1. What action, if any, has your agency taken with respect to the prescribers identified to the Committee?

Of the 56 prescribers identified to the Committee: 13 were terminated from coverage; 24 are under further review; two will not be renewed when their contracts expire later this year; and 17 were determined to have appropriate prescribing patterns for their practice setting (specialty and location).

2. Not applicable.
3. Please identify which of the providers identified to the Committee remain eligible to bill for the Medicaid Program.

See Appendix B for this list.

4. Please provide the 2010 and 2011 numbers for the top prescribers of these same drugs.

See Appendix C for these lists.

5. Has each of these prescribers been cross-checked for complaints or misconduct with the state medical board or the National Practitioner Data Bank? If not, do you plan to do so?

OHCA receives a regular data feed from the Oklahoma Board of Medical Licensure so that we are notified immediately of any disciplinary action taken against their licensees. We are aware of the National Practitioner Data Bank, but have not been using it. We now plan to incorporate it in our systems where appropriate.

6. Have any of the prescribers identified to this Committee been referred to your state medical board?

Yes.

7. Is there any system set up in your state to identify and monitor excessive prescription writing? If not, why not?

Yes.

8. Have you received any training or guidance from the Centers for Medicare and Medicaid Services to help identify potential issues with prescription drugs?

No.

9. Does your state maintain a database of all prescribed controlled-substances? If so, what entities have access to it?

Yes, there is a database of all filled prescriptions for controlled-substances. Generally, only law enforcement agencies are granted access to the database. One investigator at OHCA has access to the database to perform specific inquiries. We are currently in discussion with the agency over this database to allow access by select medical staff. The most likely uses are in our pharmacy lock-in program and in case management.

10. Does your state have any point-of-sale restrictions related to maximum units, prior authorization, therapeutic duplication, or early refill?

Yes. See Appendix D for details.

11. Were any of these top ten prescribers identified in the federally-mandated Drug Utilization Review or CMS-based retrospective reviews?

Yes.

12. Does your state have any programs in place to educate providers about the prescription of antipsychotics to children and adolescents?

Yes. Oklahoma has been actively educating providers about evidence-based best practices in the prescribing of psychiatric medications to children since 2005. OHCA sent detailed mailings to providers who were prescribing psychiatric medications to children. The mailings included the information about the child, the drugs being prescribed by the physician receiving the mailing as well as any other prescribers of psychiatric medications. This program was in place until 2009. At that time, the program was transitioned to focus on the top 600 children with co-occurring behavioral and physical health conditions. This program was called Medical Risk Management. OHCA won a bronze award for this program from URAC.

Currently, OHCA is working with a project called MEDNET, a collaboration of six states, to pilot and determine the best ways to disseminate research findings pertinent to prescribing of atypical antipsychotics. Oklahoma's project specifically focuses on children ages 5-14 years who are receiving atypical antipsychotic medications.

Since April 2010, OHCA has required a second opinion prior authorization for children four years old and younger before an atypical antipsychotic medication is approved for use. More information about this program can be found in Appendix A.

If you have any additional questions or need clarification, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Garth L. Splinter, MD".

Garth L. Splinter, MD, MBA  
State Medicaid Director

Enclosures: Appendix A  
Appendix B  
Appendix C  
Appendix D

## Appendix A- Atypical Antipsychotics

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**Tier 1 products are available without prior authorization.**

**No member co-pay for risperidone at pharmacy.**

### **Tier 2 Authorization Criteria**

#### **1.) Current users/inpatient discharge:**

- Members currently stabilized on a higher tiered medication in the past 90 days will be approved.
- Members being released from an inpatient facility and stabilized on a higher tier medication will be approved.

#### **2.) Clinical conditions:**

- Approvals will be granted for members with clinical conditions for which lower tiered drugs are contraindicated.
- Approvals will be granted for members whose current regimen includes drugs known to adversely interact with all lower tiered drugs.

#### **3.) Step therapy:**

- A trial of risperidone, at least 14 days in duration, titrated to recommended dose, that did not yield adequate response or resulted in intolerable adverse effects.

### **Tier 3 Authorization Criteria**

#### **1.) Current users/inpatient discharge:**

- Members currently stabilized on a higher tiered medication the past 90 days will be approved.
- Members being released from an inpatient facility and stabilized on a higher tier medication will be approved.

#### **2.) Clinical conditions:**

- Approvals will be granted for members with clinical conditions for which lower tiered drugs are contraindicated.
- Approvals will be granted for members whose current regimen includes drugs known to
- Adversely interact with all lower tiered drugs.

### 3.) Step therapy:

- A trial of risperidone, at least 14 days in duration, titrated to recommended dose, that did not yield adequate response or resulted in intolerable adverse effects, and
- A trial of two Tier 2 medications, at least 14 days in duration, titrated to recommended dose, that did not yield adequate response or resulted in intolerable adverse effects.

### Other Authorization Criteria

- For aripiprazole and quetiapine extended release, or olanzapine/fluoxetine: a diagnosis of depression requires concurrent use of an antidepressant, and previous trials with at least two other antidepressants. **\*Tier structure still applies.**

Tier 1	Tier 2	Tier 3
<ul style="list-style-type: none"> <li>• clozapine (Clozaril®)</li> <li>• risperidone (Risperdal®)</li> </ul>	<ul style="list-style-type: none"> <li>• aripiprazole (Abilify®)</li> <li>• iloperidone (Fanapt™)</li> <li>• asenapine (Saphris®)</li> <li>• quetiapine ER (Seroquel XR®)</li> </ul>	<ul style="list-style-type: none"> <li>• clozapine (Fazaclo®)</li> <li>• ziprasidone (Geodon®)</li> <li>• paliperidone (Invega®)</li> <li>• lurasidone (Latuda®)</li> <li>• quetiapine (Seroquel®)</li> <li>• olanzapine/fluoxetine (Symbyax®)</li> <li>• olanzapine (Zyprexa®)</li> </ul>

## Appendix B- Providers still eligible to prescribe with SoonerCare

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1063487361
1346336856
1902901531
1124060199
1609933100
1417922709
1538111976
1548217813
1578556171
1588633119
1598774242
1629002761
1649201807
1649344839
1669446225
1710979315
1720048010
1770581845
1851307607
1891861449
1922011311
1922091511

1184688509
1003981135
1487751004
1700847118
1265525042
1558318030
1699823435
1851357974
1922050335
1013077130
1023057668
1083665665
1124054986
1174504245
1215906227
1316914120
1386787547
1366503930
1003987611
1013129329
1114997582

## Appendix C- Top 10 prescribers by drug

2010

Drug	Prescriber NPI	ICN Count	Total RA
ABILIFY	1225065006	1,941	\$974,752.36
	1316994551	782	\$369,591.12
	1851357974	771	\$416,339.49
	1245326925	673	\$373,110.59
	1700950268	657	\$331,613.42
	1558318030	631	\$296,399.50
	1982677654	596	\$267,951.82
	1356432637	579	\$326,173.65
	1811985062	539	\$277,541.83
	1992770853	537	\$240,366.97
GEODON	1700950268	446	\$145,513.56
	1225065006	288	\$138,079.47
	1851357974	264	\$122,067.38
	1316994551	219	\$87,246.56
	1336222504	202	\$100,509.74
	1699844043	187	\$87,405.15
	1437296001	181	\$63,577.84
	1659390284	172	\$54,627.94
	1922050335	157	\$80,529.74
	1982636809	150	\$36,157.38
SEROQUEL	1558318030	1,002	\$527,556.70
	1225065006	752	\$306,817.46
	1316994551	697	\$308,358.75
	1245326925	657	\$298,867.90
	1851357974	529	\$253,686.14
	1336222504	507	\$275,028.51
	1851307607	500	\$186,744.14
	1700950268	476	\$215,458.83
	1922050335	441	\$164,349.86
	1396965091	435	\$158,216.53
ZYPREXA	1336222504	683	\$466,195.57

	1558318030	230	\$173,857.53
	1851307607	223	\$110,145.65
	1225064041	203	\$94,532.63
	1699844043	199	\$154,623.92
	1851366942	197	\$117,994.41
	1316994551	185	\$128,796.70
	1851357974	185	\$177,767.04
	1922050335	185	\$133,745.65
	1700950268	167	\$117,479.34
RISPERDAL	1225065006	1,372	\$23,180.59
	1396965091	1,371	\$21,224.27
	1316994551	1,273	\$42,721.39
	1558318030	821	\$31,617.49
	1841384021	759	\$130,694.98
	1245326925	698	\$30,443.38
	1700950268	618	\$14,273.08
	1033103304	559	\$10,066.62
	1225064041	485	\$8,305.09
	1851357974	471	\$12,126.23
OXYCONTIN	1932195179	1,305	\$168,965.34
	1174504245	879	\$229,701.64
	1255431409	789	\$179,579.14
	1124060199	690	\$173,379.45
	1346336856	424	\$76,554.82
	1487751004	350	\$24,999.77
	1003981135	335	\$56,419.45
	1700847118	331	\$52,661.89
	1487616900	313	\$29,566.51
	1730252289	299	\$67,793.29
OXYCODONE	1124060199	527	\$29,515.21
	1487616900	480	\$16,465.41
	1235221235	462	\$5,056.32

	1932195179	418	\$21,469.48
	1487751004	409	\$17,405.38
	1801809629	363	\$3,893.57
	1487605846	362	\$4,641.82
	1649489303	274	\$1,975.55
	1912081159	273	\$11,386.15
	1174504245	253	\$10,660.82
XANAX	1922050335	3,274	\$30,429.39
	1598774242	2,243	\$13,350.82
	1225065006	1,273	\$12,147.37
	1558318030	1,131	\$10,293.07
	1699823435	1,087	\$11,008.39
	1720048010	1,060	\$10,560.02
	1275562076	1,017	\$9,294.39
	1932195179	1,013	\$10,107.67
	1851357974	995	\$13,620.49
	1265525042	972	\$12,159.97

## 2011

Drug	Prescriber NPI	ICN Count	Total RA
ABILIFY	1225065006	1,466	\$ 854,669.91
	1245326925	927	\$ 592,703.33
	1316994551	769	\$ 429,616.88
	1346431822	588	\$ 314,157.32
	1851357974	488	\$ 284,823.17
	1396965091	482	\$ 267,183.92
	1336222504	461	\$ 246,681.42
	1508934126	454	\$ 249,157.94
	1316983075	452	\$ 279,342.67
	1558318030	447	\$ 253,908.85
GEODON	1700950268	340	\$ 123,018.42
	1225065006	285	\$ 146,759.62
	1316994551	256	\$ 115,921.11
	1336222504	218	\$ 112,395.47
	1851357974	208	\$ 103,963.36
	1235129099	163	\$ 80,968.91

	1467451484	138	\$ 74,575.28
	1437296001	134	\$ 45,356.11
	1306884705	115	\$ 60,766.27
	1699844043	113	\$ 50,714.87
SEROQUEL	1558318030	738	\$ 462,186.80
	1225065006	707	\$ 356,261.91
	1316994551	628	\$ 336,345.39
	1245326925	534	\$ 259,395.36
	1336222504	521	\$ 287,604.78
	1700950268	374	\$ 202,760.21
	1851307607	354	\$ 172,784.29
	1851357974	346	\$ 202,238.25
	1356432637	331	\$ 206,483.21
	1922050335	328	\$ 162,715.89
ZYPREXA	1336222504	589	\$ 543,692.93
	1700950268	198	\$ 176,693.75
	1558318030	197	\$ 166,076.38
	1467451484	167	\$ 158,611.06
	1316994551	163	\$ 132,597.87
	1225065006	158	\$ 164,048.45
	1659390284	153	\$ 135,588.82
	1851307607	146	\$ 85,415.11
	1851366942	146	\$ 100,171.80
	1922050335	139	\$ 121,896.83
RISPERDAL	1225065006	1,720	\$ 23,723.28
	1316994551	1,604	\$ 39,529.40
	1396965091	1,497	\$ 20,092.26
	1245326925	1,462	\$ 32,855.19
	1558318030	1,093	\$ 23,379.91
	1700950268	1,061	\$ 15,259.03
	1982677654	737	\$ 9,666.88
	1649332214	717	\$ 9,495.32
	1033103304	678	\$ 10,523.82
	1841384021	655	\$ 72,074.69
OXYCONTIN	1932195179	2,135	\$ 222,047.53
	1124060199	624	\$ 124,954.48



	1174504245	605	\$ 167,398.51
	1255431409	544	\$ 72,904.70
	1356423784	528	\$ 50,177.80
	1245220839	522	\$ 59,929.07
	1841252145	498	\$ 168,879.58
	1346336856	411	\$ 72,636.48
	1487751004	340	\$ 29,403.18
	1730252289	327	\$ 71,174.30
OXYCODONE	1932195179	576	\$ 35,718.24
	1124060199	458	\$ 21,466.82
	1487751004	454	\$ 20,273.45
	1487616900	451	\$ 13,420.27
	1235221235	435	\$ 4,613.40
	1487605846	357	\$ 4,235.61
	1801809629	337	\$ 3,441.30
	1013975580	321	\$ 15,089.04
	1790887529	314	\$ 13,888.84
	1649489303	300	\$ 2,077.81
XANAX	1922050335	3,940	\$ 38,276.29
	1598774242	2,901	\$ 19,391.44
	1225065006	1,997	\$ 20,732.90
	1932195179	1,936	\$ 20,014.54
	1699823435	1,497	\$ 15,350.80
	1275562076	1,315	\$ 12,713.00
	1558318030	1,282	\$ 12,143.71
	1922011311	1,267	\$ 11,854.71
	1720048010	1,120	\$ 11,314.95
	1912081159	954	\$ 9,291.58

## Appendix D- Utilization Controls for Narcotic Analgesics in the SoonerCare Program

The SoonerCare pharmacy benefit design includes several controls for the appropriate use of narcotic analgesics, including quantity limits, early refill edit, high dose edit, ingredient duplication edit, maximum number of prescriptions per year, and step therapy. Each of these is discussed below.

- **Quantity limits** – Narcotic analgesics are limited to the usual monthly supply. For example, OxyContin should be dosed one tablet every 12 hours, and therefore is limited to 60 tablets per month. In special circumstances, the quantity limit can be waived when medically necessary.
- **Early refill edit** – All prescriptions are subject to a 75% usage prior to refill of the same medication.
- **High dose edit** – Since there is no upper limit on most narcotic analgesics, those containing acetaminophen are limited according to the acetaminophen content of the product.
- **Ingredient duplication edit** – This edit stops a prescription claim if the member has received a prior prescription claim for a different strength of hydrocodone and the new claim is within the previous claim's active period. For example, if a member got a 10 day prescription for hydrocodone 7.5 mg on September 25 and tried to get a prescription for hydrocodone 5 mg on September 30, the claim would deny.
- **Maximum number of prescriptions per year** – This edit applies to hydrocodone and the member is limited to 13 prescriptions within a 12 month period. The goals of this edit is to (1) limit payment for repeat fills of small quantities most often seen with doctor shopping, and (2) encourage patients with chronic pain to seek treatment with a qualified pain management physician so as not to consume large quantities of hydrocodone and acetaminophen.
- **Step therapy** – All narcotic analgesics are placed into a step therapy category. The information about this process is shown on the back of this page. The premise of the step therapy process is that members should not be started on long acting pain control until they have some experience with immediate release narcotics. Within the long acting narcotics, they are segregated into preferred (Tier 2) and non-preferred (Tier 3) product groups. Additionally, all branded short acting products require a prior authorization, as do the short acting fentanyl products such as Actiq. Most of the fentanyl immediate release products are approved only for oncology related diagnoses.

### Quantity Limits

Narcotic Analgesics: <http://www.okhca.org/providers.aspx?id=11146>

Antipsychotics: <http://www.okhca.org/providers.aspx?id=11153>

Benzodiazepines: <http://www.okhca.org/providers.aspx?id=12088>

General: <http://www.okhca.org/providers.aspx?id=1220>

### Prior Authorization Criteria

Narcotic Analgesics: <http://www.okhca.org/providers.aspx?id=1218#34>

Antipsychotics: <http://www.okhca.org/providers.aspx?id=1218#Atypical>

Benzodiazepines: <http://www.okhca.org/providers.aspx?id=1218#6>

General: <http://www.okhca.org/providers.aspx?id=1218>